UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

MAY 02 2016

CERTIFIED MAIL-RETURN RECEIPT REQUESTED
Article Number: 7015 3010 0000 7503 6927

Mr. George Galbraith, Licensed Operator
Department of Public Works
Borough of Woodland Park
One Browertown Road
Woodland Park, New Jersey 07424

Re: **Request for Information ("RFI") Pursuant to Section 308 of the Clean Water Act**
Docket No. CWA-IR-16-018
Sanitary Sewer System Compliance Evaluation Inspection
Borough of Woodland Park Sanitary Sewer System
NJPDES Tracking ID No. NJP000160

Dear Mr. Galbraith:

As part of a joint effort between the United States Environmental Protection Agency ("EPA") and the New Jersey Department of Environmental Protection ("NJDEP") to ensure that the discharge of sanitary sewage is minimized, we conducted a Sanitary Sewer System ("SSS") Compliance Evaluation Inspection ("CEI") of the Borough of Woodland Park system on March 22, 2016. Enclosed is a copy of the CEI report detailing EPA's findings.

The EPA is charged with the protection of human health and the environment under the Clean Water Act ("CWA" or "Act"), 33 U.S.C. §§ 1251 et seq. Section 308(a) of the CWA, 33 U.S.C. § 1318(a), provides that whenever it is necessary to carry out the objectives of the CWA, including determining whether or not a person/agency is in violation of Section 301 of the CWA, 33 U.S.C. § 1311, the EPA shall require the submission of any information reasonably necessary to make such a determination. Under the authority of Section 308 of the CWA, EPA may require the submission of information necessary to assess the compliance status of any facility and its related appurtenances.

Within **thirty (30) calendar days** of receipt of this RFI, the Borough is hereby required, pursuant to Section 308(a) of the Clean Water Act, 33 U.S.C. § 1318(a), to submit to EPA a detailed written summary of the steps the Borough has taken or will take to address each of the **Potential CWA Non-Compliance, Potential N.J.A.C. Non-Compliance** and **Areas of Concern** detailed in the enclosed CEI Report.

All information required to be submitted by this RFI shall be sent by certified mail or its equivalent to:

Doughlas McKenna, Chief
Water Compliance Branch
Division of Enforcement and Compliance Assistance
U.S. Environmental Protection Agency – Region 2
290 Broadway, 20th Floor
New York, NY 10007-1866

Any documents to be submitted by the Borough must be sent by certified mail or its equivalent and shall be signed by an authorized representative of the respective entity (see 40 C.F.R. § 122.22), and shall include the following certification:

> "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitted false information, including the possibility of fine and imprisonment for knowing violations."

Failure to provide the required information may subject the Borough to civil/criminal penalties pursuant to Section 309 of the CWA. Failure to comply with the RFI shall also subject the facility to ineligibility for participation in work associated with Federal contracts, grants or loans.

Additionally, further guidance and information concerning the control of Sanitary Sewer Overflows ("SSOs") may be found by accessing the following EPA web site: https://www.epa.gov/npdes/sanitary-sewer-overflows-ssos.

If you have any questions, please feel free to contact Ms. Kimberly McEathron, of my staff, at (212) 637-4228 or via email at mceathron.kimberly@epa.gov.

Sincerely yours,

Doughlas McKenna, Chief
Water Compliance Branch

w/enclosures

cc: Marcedius Jameson, NJDEP
Keith Kazmark, Mayor, Borough of Woodland Park
Melissa Hornsby, NJDEP (Melissa.Hornsby@dep.nj.gov)
Rich Paull, NJDEP (Rich.Paull@dep.nj.gov)
Theophilus Ashie, NJDEP (Theophilus.Ashie@dep.nj.gov)
Bridget McKenna, PVSC (BMcKenna@PVSC.com)

United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 [ ] 2 [5]	3 [NJP0001601] 11	12 [160322] 17	18 [6]	19 [R]	20 [ ]

Remarks

21 [ ] 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved
67 [01] 69	70 [ ]	71 [ ]	72 [ ]	73 [ ] 74 75 [ ] 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*

Borough of Woodland Park
One Browertown Road
Woodland Park, New Jersey 07424

Entry Time/Date	Permit Effective Date
12:30 PM / 03/22/2016	
Exit Time/Date	**Permit Expiration Date**
4:00 PM / 03/22/2016	

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)

George Galbraith, Licensed Operator
Borough of Woodland Park
One Browertown Road
Woodland Park, New Jersey 07424
Phone: (973) 256-1264

Other Facility Data *(e.g., SIC NAICS, and other descriptive information)*

Name, Address of Responsible Official/Title/Phone and Fax Number

George Galbraith, Licensed Operator
Borough of Woodland Park
One Browertown Road
Woodland Park, New Jersey 07424
Phone: (973) 256-1264

Contacted: [✓] Yes [ ] No

Section C: Areas Evaluated During Inspection *(Check only those areas evaluated)*

[ ] Permit	[ ] Self-Monitoring Program	[ ] Pretreatment	[ ] MS4
[ ] **Records/Reports**	[ ] Compliance Schedules	[ ] Pollution Prevention	
[✓] Facility Site Review	[ ] Laboratory	[ ] Storm Water	
[ ] Effluent/Receiving Waters	[✓] Operations & Maintenance	[ ] Combined Sewer Overflow	
[ ] Flow Measurement	[ ] Sludge Handling/Disposal	[✓] Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes	SEV Description
[ ][ ][ ][ ][ ]	
[ ][ ][ ][ ][ ]	
[ ][ ][ ][ ][ ]	
[ ][ ][ ][ ][ ]	

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Kimberly McEathron	USEPA/DECA-WCB/212-637-4228	4/26/2016

Signature of Management Q A Reviewer	Agency/Office/Phone and Fax Numbers	Date
Larry Dorn	USEPA/DECA-WCB/212-637-3950	4/27/16

INSTRUCTIONS

Section A: National Data System Coding *(i.e., PCS)*

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. *(Use the Remarks columns to record the State permit number, if necessary.)*

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

A	Performance Audit	U	IU Inspection with Pretreatment Audit	!	Pretreatment Compliance (Oversight)
B	Compliance Biomonitoring	X	Toxics Inspection	@	Follow-up (enforcement)
C	Compliance Evaluation (non-sampling)	Z	Sludge - Biosolids	{	Storm Water-Construction-Sampling
D	Diagnostic	#	Combined Sewer Overflow-Sampling	}	Storm Water-Construction-Non-Sampling
F	Pretreatment (Follow-up)	$	Combined Sewer Overflow-Non-Sampling	:	Storm Water-Non-Construction-Sampling
G	Pretreatment (Audit)	+	Sanitary Sewer Overflow-Sampling	~	Storm Water-Non-Construction-Non-Sampling
I	Industrial User (IU) Inspection	&	Sanitary Sewer Overflow-Non-Sampling	<	Storm Water-MS4-Sampling
J	Complaints	\	CAFO-Sampling	-	Storm Water-MS4-Non-Sampling
M	Multimedia	=	CAFO-Non-Sampling	>	Storm Water-MS4-Audit
N	Spill	2	IU Sampling Inspection		
O	Compliance Evaluation (Oversight)	3	IU Non-Sampling Inspection		
P	Pretreatment Compliance Inspection	4	IU Toxics Inspection		
R	Reconnaissance	5	IU Sampling Inspection with Pretreatment		
S	Compliance Sampling	6	IU Non-Sampling Inspection with Pretreatment		
		7	IU Toxics with Pretreatment		

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

A — State (Contractor)
B — EPA (Contractor)
E — Corps of Engineers
J — Joint EPA/State Inspectors—EPA Lead
L — Local Health Department (State)
N — NEIC Inspectors
O — Other Inspectors, Federal/EPA (Specify in Remarks columns)
P — Other Inspectors, State (Specify in Remarks columns)
R — EPA Regional Inspector
S — State Inspector
T — Joint State/EPA Inspectors—State lead

Column 20: Facility Type. Use one of the codes below to describe the facility.

1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
2 — Industrial. Other than municipal, agricultural, and Federal facilities.
3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
4 — Federal. Facilities identified as Federal by the EPA Regional Office.
5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2, DECA-WCB
20th Floor, 290 Broadway, NY, NY 10007

SANITARY SEWER SYSTEM
COMPLIANCE EVALUATION INSPECTION REPORT

Compliance Evaluation Inspection: Borough of Woodland Park (formerly West Paterson) SSS	
Inspection Date: March 22, 2016 **Inspection Time:** 12:30 PM – 4:00 PM	
EPA Inspector: Kimberly McEathron, Physical Scientist, USEPA Region 2, (212) 637-4228	
Borough Representative: George Galbraith, Licensed Operator, Department of Public Works, Borough of Woodland Park, (973) 256-1264	
Other Representative: Bridget McKenna, Chief Operating Officer, Passaic Valley Sewerage Commission, (973) 817-5976	
Site Information:	Borough of Woodland Park One Browertown Road Woodland Park, New Jersey 07424 NJPDES Tracking ID No. NJP000160

I. Background and Findings

Collection System:

1. The Passaic Valley Sewerage Commission (PVSC) Wastewater Treatment Plant (WWTP), New Jersey Department of Environmental Protection (NJDEP) New Jersey Pollutant Discharge Elimination System (NJPDES) No. NJ0021016, is a large sized Publicly Owned Treatment Works (POTW).

2. The PVSC WWTP treats separate sanitary sewage from the Borough of Woodland Park formerly known as West Paterson ("Woodland Park" or "Borough").

3. The PVSC and the Borough have an intermunicipal agreement dated April 25, 1984 regarding the conveyance and treatment of sanitary sewage.

4. The Borough's owned and operated sanitary sewage force main combines with sanitary sewage from Totowa and Little Falls in Woodland Park and continues through the City of Paterson into PVSC's interceptor on Curtis Place in Paterson. Immediately adjacent to where sanitary sewage from Woodland Park, Totowa and Little Falls enters the PVSC interceptor is the City of Paterson Curtis Place Combined Sewer Overflow (CSO) outfall (001) (NJPDES No. NJ0105023) which discharges to the Passaic River during overflow events.

5. The Borough and Little Falls have an intermunicipal agreement dated October 10, 1985 regarding the conveyance of sanitary sewage. Woodland Park also has intermunicipal agreements with Totowa dated October 10, 1985 and the City of Paterson dated November 7, 1984 and amended April 18, 1985, regarding the conveyance of sanitary sewage.

6. According to the Borough representative, there are no upstream contributors of sanitary sewage into the Borough's SSS except for the Little Falls and Totowa force main connections.

7. The total Borough population is approximately 12,000 residents with approximately 8,900 of those residents on sanitary sewers, according to the Borough representative. According to the Borough representative, the Borough is approximately 65% residential, 5% industrial/commercial and the remaining 30% is undeveloped.

8. The Borough Sanitary Sewer System (SSS) consists of separate sanitary sewers with approximately 945 manholes and 39.28 miles of sewer piping.

9. According to the Borough representative, the Borough SSS was originally constructed in 1920 and approximately 50% is composed of clay with the force main composed of ductile iron pipe.

10. The Borough SSS maps provided at the time of the inspection were dated June 1978 and were developed by Gar Chew Lai – Robert P. Schilling. The maps depict gravity line manholes and pipe segments built prior to 1978. The maps do not depict the force main, pump stations or newly constructed segments.

11. According to the Borough representative, he (George Galbraith) is the Licensed Operator of the collection system.

Pump Stations:

12. The Borough operates and maintains five (5) pump stations in the SSS (McBride, Hugo Avenue, Lackawanna, Dujets and Boulder).

13. All five (5) pump stations are equipped with Supervisory Control and Data Acquisition (SCADA) alarm systems which provides cell phone notification directly to operations staff in the event of an alarm. In addition, the SCADA systems are monitored by operations staff remotely at the Department of Public Works (DPW) office. McBride, Lackawanna and Boulder pump stations are equipped with on-site back up power generators. Hugo Avenue and Dujets pump stations have portable generator capabilities.

14. The Borough conducts daily pump station checks which are documented on a form.

Flow Metering and Billing:

15. The Borough owns flow meters located at the Lackawanna and Boulder pump stations but according to the Borough representative, the Borough does not utilize these meters to monitor flow. The Borough documents flow totalizer readings by making a copy of the circular chart that records flows from the PVSC owned and operated flow meter located at the McBride Pump Station. At the time of the inspection, the flow was 2.99 MGD. According to flow records for the McBride Pump Station, the average flow for the Borough was 1.46 MGD in 2015 and 1.60 MGD in 2014.

16. PVSC bills the Borough based on metered sanitary sewage flow rates on a quarterly basis. PVSC also bills Totowa and Little Falls based on metered sanitary sewage flow. According to the Borough representative, the Borough splits the cost for force main work among the Borough, Totowa and Little Falls based on percentage of flow and sends a bill.

17. The intermunicipal agreement between PVSC and Woodland Park states "It is understood and agreed that in no event shall the total flow or discharge from the lessee be in excess of an average of 2,000,000 gallons per day. It is further understood and agreed that lessees connection to the Commissioners systems shall be constructed in such a manner as to limit the maximum rate of flow from the lessees pumping station to be no more than a rate of 5,000,000 gallons per day".

SSO Discharges / Spills:

18. According to Borough documentation, the Borough has experienced four (4) Sanitary Sewer Overflows (SSOs) or spills in the past five (5) years within the collection system as detailed below:

    a. On 8/28/2011, a flood event (Hurricane Irene) caused the sanitary sewer main to surcharge at Newby Avenue and West 34th Street resulting in the discharge of approximately 500 gallons per minute of sewage to the Passaic River. The NJDEP hotline was notified of this event;
    b. On 1/16/2012, a sanitary sewer overflow at Route 46 and Browertown Road resulted in the discharge of approximately 500 gallons into the Peckman River. The NJDEP hotline was notified of this event;
    c. On 2/2/2012, the force main failure repairs in Woodland Park resulted bypass of approximately 900 gallons per minute for 3 hours (162,000 total gallons) of sanitary sewage into the Passaic River. The NJDEP was notified of this event; and
    d. On 12/18/2015, a sanitary sewer overflow was caused by a blockage in the sanitary sewer. The NJDEP hotline was notified of this event. According to the Borough representative, the full report for this event could not be located. According to the Borough representative, this event involved an overflow from the sanitary sewer manhole resulted in the discharge of sanitary sewage to the Passaic River via the storm sewers.

19. The Borough has a written procedure and a form to be used in response and reporting of sanitary sewer overflows and spills.

20. Sanitary sewer system spills and overflows that enter the storm sewer system would ultimately discharge to the Passaic River.

Residential Complaints / Collection System Insurance:

21. According to Borough the representative, the Borough responds to residential complaints regarding sewage backups and has received approximately three (3) complaints of backups which were due to blockages in the sewer main over the past five (5) years. According to the Borough representative, residential complaints are not documented in a separate log and are not necessarily documented in the routine maintenance log maintained by the Borough.

22. According to the Borough representative, the Borough maintains insurance for the collection system.

23. According to the Borough representative, there are been no insurance claims made or paid as a result of SSOs or spills to affected property owners in the past five (5) years.

Collection System Maintenance:

24. The Borough has developed an Operation and Maintenance (O&M) Plan for the collection system, which includes routine maintenance procedures, emergency response, equipment, bypass and clean up procedures, training, Fats, Oils and Grease (FOG) program, manhole inspections and SSO notification and reporting procedures.

25. The Borough adopted an Ordinance which restricts the discharge of grease to the sewer system, specifically any water or waste containing fats, wax, grease or oils in excess of 150 milligrams per liter.

26. According to the Borough representative, the Borough owns a sewer jet, televising equipment and portable generators for collection system maintenance.

27. The preventative maintenance program developed by the Borough includes daily pump station and force main checks which are documented on daily check sheets. In addition, collection system problem areas such as Andrews Drive Zone "D" and Willow Way are inspected and cleaned as needed.

28. According to the Borough representative, monthly operational reports summarizing all events described in N.J.A.C. 7:10A-1.12(b) and the remedial action taken have been sent to PVSC periodically but several months have been missed. For example, the Borough provided monthly reports for January 2015, February 2015, March 2015, April 2015, May 2015 and December 2015. The months of June 2015 through November 2015 were not provided at the time of the inspection.

Inflow and Infiltration (I/I):

29. The Borough adopted Ordinance Chapter XXVI Utilities which prohibits inflow to the sanitary sewer, including any groundwater, roof runoff and subsurface drainage. According to the Borough representative, prior to issuing a Certificate of Occupancy the Borough conducts a sewer inspection to identify and remedy any sources of inflow or illicit connections.

30. In 1984, the then Totowa – West Paterson Sewerage Authority conducted a Sewer System Evaluation Survey (SSES). The report was prepared by Gar Chew Lai-Robert Schilling, consulting engineers and details the findings and results of rainfall simulation, smoke tests, dye tests and sewer rehabilitation work. In total, approximately 169 smoke tests were performed and sixty (60) properties with illegal connections were identified, primarily roof leaders and driveway drains and eight (8) locations where the storm sewer was connected to the sanitary sewer. The amount of infiltration estimated to be removed from the system as a result of the sewer rehabilitation work was estimated to be 250,314 gallons per day with an estimated 296,438 gallons per day of infiltration remaining. The total cost associated with the completed study and rehabilitation work was estimated at $459,037.74. The average amount of inflow calculated was 206,000 gallons per day. According to the Borough representative, all illegal connections and sources of inflow identified have been eliminated since the study, although documentation of each instance was not provided. It is unknown the amount of inflow removed from the system as a result of these disconnections. In addition, the study recommended sewer overflows in thirty-nine (39) manholes along the Passaic River south of Willow Way be plugged. It is unknown if these sanitary sewage overflow points have all been sealed.

31. In 1991, the Borough contracted televising the sanitary sewers, manhole inspections and joint and manhole grouting to eliminate sources of infiltration into the SSS. According to the report prepared by Video Pipe Services, Inc., a total of approximately sixty-five (65) manholes were rehabilitated with approximately 404 vertical area rehabilitated. In addition, approximately 106 pipe segments (totaling 19,226 feet) were inspected with joints grouted as necessary.

32. According to the Borough representative, approximately 75 to 100 manhole disc inserts have been installed to prevent and address inflow through the manhole covers at low lying, wetland and high groundwater locations along the Passaic River.

33. According to flow records for the McBride Pump Station, the average sanitary sewage flow for the Borough was 1.46 MGD in 2015 and 1.60 MGD in 2014. According to flow records, the Borough's peak flow in 2015 was 3.028 MGD which occurred on March 15, 2015. According to historical rain data, on March 14, 2015 a 0.55 inch rain event occurred.

Municipal Separate Storm Sewer System (MS4):

34. The Borough also operates and maintains the storm sewer system which consists of an estimated 607 catch basins.

35. The Borough Ordinance 06-13 Illicit Connection, adopted on November 22, 2006, prohibits illicit connections and discharges to the storm sewers.

Gathered Information:

36. At the time of the inspection, the Borough representative provided EPA with a copy of the following:

    a. Written response to EPA's list of questions;
    b. PVSC and the Borough intermunicipal agreement dated April 25, 1984;
    c. Borough and Little Falls intermunicipal agreement dated October 10, 1985;
    d. Woodland Park intermunicipal agreement with Totowa dated October 10, 1985;
    e. Woodland Park intermunicipal agreement with City of Paterson dated November 7, 1984 and amended April 18, 1985;
    f. SSS maps dated June 1978 produced by Gar Chew Lai – Robert P. Schilling;
    g. Totalizer flow charts for McBride Pump Station;
    h. Invoices and purchase orders for PVSC dated 1/7/2015 - 9/30/2015;
    i. Borough NJDEP Action Line Notification Procedure;
    j. SSO documentation dated 12/21/2015, 9/20/2011, 9/9/2011, 1/16/2012, 2/2012, 9/2012;
    k. Certification of Liability Insurance;
    l. Borough O&M Plan excerpt;
    m. Ordinance Chapter XXVI Utilities;
    n. 2014 and 2015 McBride Pump Station flow table;
    o. Daily Operating Check List;
    p. Sanitary Force Main Inspection form; and
    q. FOG program.

Addendum:

37. Subsequent to the inspection, on March 23, 2016 George Galbraith emailed EPA stating that the manhole on Willow Way was cleaned and included photographs documenting that the flow in the channel was not in the surcharged condition observed at the time of the EPA inspection.

II. Summary

Based on the information provided during the SSS CEI, the Woodland Park SSS has experienced four (4) sanitary sewer overflows (SSOs) or spills in the collection system that resulted in discharges to waterbodies in the past five (5) years. At least one (1) was related to a wet weather event. See the Potential CWA Non-Compliance and Potential N.J.A.C. Non-Compliance for details regarding steps the Borough must take and the Areas of Concern / Recommendations sections below for steps the Borough should take to properly operate and maintain the SSS.

1. POTENTIAL CWA NON-COMPLIANCE

   a. The 1984 Sewer System Evaluation Survey (SSES) study identified sanitary sewer overflow discharge points to the Passaic River from thirty-nine (39) manholes south of Willow Way. The study recommended that these manhole overflows be plugged but it is unknown if these overflow points have actually all been sealed and remain sealed. These sanitary sewer overflow discharge points are not authorized under a New Jersey Pollutant Discharge Elimination System (NJPDES) Permit and any pollutant discharges to the Passaic River from these manhole overflow points could constitute a violation of the Clean Water Act. Therefore, the Borough must ensure that these overflow points have been sealed and remain sealed to eliminate discharges from these locations.

2. POTENTIAL N.J.A.C. NON-COMPLIANCE

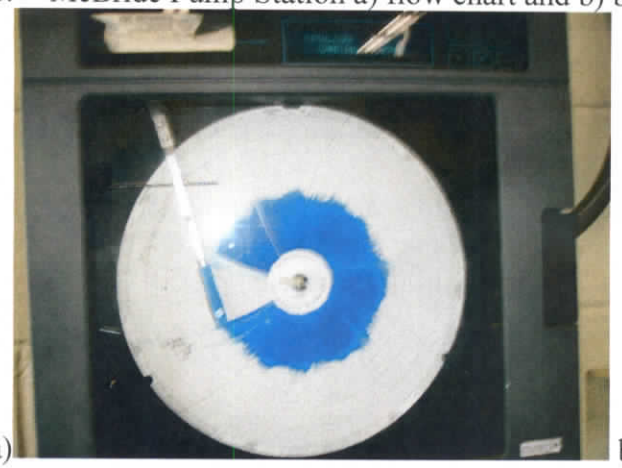
   a. According to the Borough representative, monthly operational reports summarizing all events described in N.J.A.C. 7:10A-1.12(b) and the remedial action taken have been sent to PVSC periodically but several months have been missed. At the time of the inspection, the Borough was unable to produce monthly operational reports for the months of June 2015 through November 2015. The Borough's Licensed Operator must submit monthly operational reports to PVSC as required by N.J.A.C. 7:10A-1.12(b).

3. AREAS OF CONCERN / RECOMMENDATIONS

   a. Despite efforts in the 1980's and 1990's to reduce inflow and infiltration (I/I), the Woodland Park SSS continues to have sources of I/I contributing to increased sanitary sewer flows, based on flow records and the Sewer System Evaluation Survey (SSES) which estimated approximately 296,438 gallons per day of infiltration remaining in the system at that time. The Borough should verify that all inflow and infiltration sources identified in the SSES study have been removed and that all recommended actions have been completed and then consider evaluating portions of the system that have not yet been evaluated or where conditions may have changed since the 1984 study.
   b. The Borough SSS maps provided at the time of the inspection were dated June 1978 and were produced by Gar Chew Lai – Robert P. Schilling. The maps depict gravity line manholes and pipe segments built prior to 1978. The maps do not depict the force main, pump stations or newly constructed segments which should be added to a comprehensive SSS map.
   a. The Borough should document residential complaints and responses to residential complaint regarding blockages or backups in the SSS.

III. Field Work

1. *McBride* Pump Station a) flow chart and b) bar screen and communitor (2 photographs);

a)  b) 

2. Willow Way manhole #1, flow stagnant, out of channel, surcharged (1 photograph);

3. Upstream Willow Way manhole #2, flow slow, out of channel, surcharged, some rags visible (1 photograph);

4. Manhole on Andrews Drive a) with insert, b) pulpy build up in pipe from recycling facility, c) 2nd manhole in driveway off Andrews Drive with flow from recycling facility (3 photographs);

a)

b)

c)

5. Lower Notch/Lackawanna Pump Station wet well and influent (1 photograph);